

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
MOON GROUP, INC., et al. ¹ ,)	Case No. 21-11140 (CSS)
)	
Debtors.)	(Joint Administration Requested)
)	
)	Related Docket No. 140

**NOTICE OF FILING OF REVISED PROPOSED INTERIM ORDER
AUTHORIZING DEBTOR-IN-POSSESSION FINANCING**

PLEASE TAKE NOTICE that on September 14, 2021, the Debtors filed their *Debtors’ Motion for Interim and Final Orders (I) Authorizing and Approving Emergency Post-Petition Financing; (II) Granting Liens; and (III) Providing Superpriority Administrative Expense Status* [Docket No. 140] (the “DIP Financing Motion”) with the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”).

PLEASE TAKE FURTHER NOTICE that attached to the DIP Financing Motion was a proposed form of the *Interim Order Authorizing Debtor-In-Possession Financing* (the “Interim DIP Financing Order”).

PLEASE TAKE FURTHER NOTICE THAT based on comments received from the United States Trustee, attached hereto as **Exhibit A** is a revised form of the proposed Interim DIP Financing Order (the “Revised Interim DIP Financing Order”). A copy of the Revised Interim DIP

¹ The Debtors in these chapter 11 cases, along with the last four digits of each of the Debtors’ respective federal tax identification numbers, are as follows: Moon Group, Inc. (7484); Moon Landscaping, Inc. (3442); Moon Nurseries, Inc. (8411); Moon Site Management, Inc. (0250); Moon Wholesale, Inc. (3232); and Rickert Landscaping, Inc. (3988). The Debtors’ headquarters and mailing address is 145 Moon Road, Chesapeake City, MD 21915.

Financing Order redlined against the order filed with the DIP Financing Motion is attached hereto as **Exhibit B**.

PLEASE TAKE FURTHER NOTICE the Debtors will seek entry of the Revised Interim DIP Financing Order at the hearing scheduled for September 15, 2021 at 10:00 p.m. (the “Hearing”) subject to any further revisions which may be agreed to prior to or at the Hearing.

Date: September 15, 2021
Wilmington, Delaware

SULLIVAN · HAZELTINE · ALLINSON LLC

/s/ William A. Hazeltine

William D. Sullivan (No. 2820)
William A. Hazeltine (No. 3294)
919 North Market Street, Suite 420
Wilmington, DE 19801
Tel: (302) 428-8191
Fax: (302) 428-8195
Email: bsullivan@sha-llc.com
whazeltine@sha-llc.com

and

Jeffrey Kurtzman, Esquire
KURTZMAN | STEADY, LLC
555 City Avenue, Suite 480
Bala Cynwyd, PA 19004
Telephone: (215) 839-1222
Facsimile: (609) 482-8011
Email: kurtzman@kurtzmansteady.com

Counsel for Debtors and Debtors in Possession